REMARKS

Claims 14-20 are pending in the application. Claim 14 has been amended. No claims have been added or cancelled herein. All claims find full support in the original specification, claims, and drawings. No new matter has been added.

35 U.S.C. 112, first paragraph rejection

The Examiner rejects claim 14 under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. The Examiner alleges that the claim contains subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it most nearly connected, to make and/or use the invention. Specifically, there is no support for the claimed invention to code the image signals that were already coded when captured.

Referring to Fig. 37 and its corresponding contents in the specification of the instant application, an exemplary embodiment of the present invention discloses that "when the pickup mode is requested by the user, displaying image signals received from the camera in a capture mode, coding each of the displayed image signals into still pictures in a photo capture mode, (referring to step (a) of claim 14), and coding a captured image signals from the camera into image data units based upon a frame size in a combined signal storing mode being performed according to user's request (referring to step (b) of claim 14)". (See line 3 on page 61-line 7 on page 62 thereof).

In this regard, claim 14 discloses that step (a) is directed to coding image signals received from the camera in a capture mode, and step (b) is directed to coding image signals received from the camera in a combined signal storing mode. That is, both step (a) and step (b) are directed to coding image signals in different modes. Accordingly, Applicants have amended "(b) ..... image data units based upon a frame

size in a combined signal storing mode" in claim 14 to read "(b)...... image data units based upon a frame size in a combined signal storing mode <u>being performed according to user' request</u>" in order to more clearly represent the aforementioned feature. Therefore, Applicants respectfully request that the Examiner withdraw the 35 U.S.C. § 112, first paragraph rejection.

Claim 14 recites in (c) and (d) the steps of displaying a plurality of combined data units stored in the memory and accessing combined data. The Examiner further alleges that the specification as filed is not enabling in the matter of displaying a plurality of combined data units without accessing, separating and decoding said combined data units.

An exemplary embodiment of the present invention discloses "Referring to Fig. 19, when the user inputs a combined signal playback mode through the key input unit 27, and the controller 10 detects the inputted moving picture playback mode at step 511 and enables the display unit 60 to display a moving picture menu at step 513. Here, information of the moving picture menu can contain a name of at least one moving picture or can contain the name of the moving picture and a place and time of moving picture capture. When the user selects a desired moving picture while the moving picture menu is displayed the controller 10 detects the selected moving picture at step 515". (See lines 12-22 on page 35 in the specification of the instant application). Furthermore, "Referring to Fig. 25, when the user inputs a combined signal transmission command through the key input unit 27, the controller 10 detects the inputted combined signal transmission command at step 551 and enables the display unit 60 to display a combined signal menu at step 553. Here, the combined signal menu can contain information indicating the names of combined signals stored in the memory 30 or information indicating the names of the combined signals and place and time information of image capture associated with the combined signals. When the user selects a desired combined signal while the combined signal menu is displayed, the controller 10 detects the selected combined signal at step 555 and accesses a corresponding combined signal stored in the memory 30 at step 557" as can be seen on lines 3-13 on page 44 of the specification thereof.

On the basis of the foregoing contents, "displaying a plurality of combined data units" in step (c) of claim 14 is directed to displaying information of a moving picture menu, and "displaying the plurality of combined data units" in step (d) is directed to displaying information of combined signal menu, so displaying the plurality of combined data units does not need to accompany the steps of accessing, separating and decoding of the combined data units.

Therefore, Applicants have amended claim 14 to incorporate "wherein the plurality of combined data units are displayed information of a moving picture menu" in step (c) of claim 14, and also amended claim 14 to incorporate "wherein the plurality of combined data units are displayed information of a combined signal menu" in step (d) of claim 14 in order to more clearly represent the aforementioned feature, as recited in amended claim 14 above. Therefore, Applicants respectfully request that the Examiner withdraw the 35 U.S.C. § 112, first paragraph rejection.

35 U.S.C. 112, second paragraph rejection

The Examiner rejects claim 14 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Line 6 of claim 14 recites "coding the captured image signals." The Examiner alleges that it is unclear if "the captured image signals" are the images displayed in a captured mode or the coded still pictures that are captured and stored in memory.

In step (b) of claim 14, "the captured image signals" corresponds to "the captured image signals from the camera" according to Fig. 37 and its corresponding contents of in the specification of the instant application. (See line 3 on page 61-line 7 on page 62 thereof).

Therefore, Applicants have amended "(b) coding the captured image signals into" in claim 14 to read "(b) coding the captured image signals from the camera into...." in order to more clearly represent the aforementioned feature, as recited in

amended claim 14 above. Therefore, Applicants respectfully request that the Examiner withdraw the 35 U.S.C. § 112, second paragraph rejection.

Allowable Subject Matter

Applicant thanks the Examiner for indicating that claims 16 and 17 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicant appreciates the indication of allowable subject matter, but wish to defer the rewriting of claims 16 and 17 in independent form pending the Examiner's consideration of the arguments presented herein.

Claim Rejections – 35 U.S.C. § 103(a)

1. The Examiner rejects claim 14 under 35 U.S.C. 103(a) as allegedly being unpatentable over **Anderson** (U.S. Patent No. 5,903,309) in view of **Nakabayashi** (U.S. Patent No. 5,903,309). Applicants respectfully traverse this rejection.

Exemplary embodiments of Applicants' claimed invention provide methods and devices comprising unique combinations of method steps and features, respectively, including, *inter alia*, a method for processing image signals in a mobile terminal equipped with a camera and an image codec, comprising the steps: (a) displaying image signals received from the camera in a capture mode, coding each of the displayed image signals into still pictures in a photo capture mode, and storing the still pictures in a memory; (b) coding captured image signals from the camera into image data units based upon a frame size in a combined signal storing mode being performed according to a user's request, coding audio signals into audio data units according to the image data units, generating each of image headers for combining the image data units and the coded audio data units, combining the image headers, the image data units and audio data units, and storing combined data units in the memory;

(c) in response to a request to view a combined data signal, displaying a plurality of combined data units stored in the memory, accessing selected combined data, separating the image and audio data units via the image headers, and decoding and reproducing the image and audio data units, wherein the plurality of combined data units are displayed information of a moving picture menu; (d) in response to a request to transmit the combined data signal, displaying the plurality of combined data units stored in the memory, accessing selected combined data and assembling transmission packets based upon the selected combined data, and transmitting the assembled transmission packets wherein the plurality of combined data units are displayed information of a combined signal menu; and (e) disassembling received packet data in a combined signal reception mode, combining the image and audio data units and storing a result of the combining in the memory (see Applicants' independent claim 14).

Neither Anderson nor Nakabayashi, alone or in combination, discloses, teaches or suggests such unique combinations of features or method steps.

The Examiner first alleges that Anderson discloses coding the captured image signals into image data units based upon a frame size in a combined signal storing mode (citing JPEG data 464' of Anderson). Applicants respectfully disagree with the Examiner's analysis.

Exemplary embodiments of the present invention disclose "The image codec 80 performs the JPEG coding operation for image data based upon a frame size and the controller 10 waits for the JPEG image data to be received. Then, when JPEG coded image data of one frame is received, the controller 10 detects the received image data at step 457 and stores the JPEG image data in the memory 30 at step 459. The controller 10 repeatedly performs the above-described operations until the moving picture mode is completed. At this time, a plurality of data units stored in the memory 30 are JPEG image data units." (See Page 25, lines 13-19 in the specification of the instant application).

Anderson merely discloses that the JPEG data 464' is comprised in the extended file format 470 that supports multiple media types. Anderson further discloses that the information field 472 comprises a series of tags for storing

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information regarding the image represented by the JPEG data 464' (see Col. 6, lines 29-40 in Anderson). Nowhere does Anderson teach or suggest coding the captured image signals into image data units based upon a frame size in a combined signal storing mode.

The Examiner then alleges that Anderson discloses coding audio signals into audio data units according to the image data units (citing Col. 7, lines 4-12 of Anderson). Applicants respectfully disagree with the Examiner's analysis.

Exemplary embodiments of the present invention disclose "When the JPEG image data is combined with audio, the user inputs an audio combining mode through the key input unit 27. Then, the controller 10 detects the input audio combining mode at step 471 and drives the image codec 80 and the audio codec 85 at step 473. If the input audio combining is not detected, other corresponding functions are performed at step 418. Then, the controller 10 enables the display unit 60 to display moving pictures stored in the memory 30 through a menu and waits for the user to select a moving picture at step 474. At this point, when the user selects a specified one of the displayed moving pictures, the controller 10 detects the selected moving picture at step 475, and enables the first JPEG frame associated with the selected moving picture to be decoded at step 477. The decoding process will now be described. The JPEG image data is applied to the image codec 80. The image codec 80 decodes received JPEG image data into original image data. A screen image generator of the image processor 50 scales the decoded image data on the basis of a size of the display unit 60 and outputs the scaled image data. Thus, the display unit 60 displays the scaled image data. Furthermore, while the image codec 80 decodes the image data of one frame, the controller 10 enables coded audio data output from the audio codec 85 to be buffered. When the JPEG coded image data of one frame is decoded, the controller 10 detects the decoded image data at step 481, accesses the buffered audio data at step 483, and enables a header necessary for combining the JPEG coded image data and the audio data to be generated at step 485." (See page 25, line 24 – page 26, line 14 in the specification of the instant application).

Anderson merely discloses that the extended file format 470 that supports multiple media types also includes a sound field 474 that contains a sound clip

associated with the image. Assuming, *arguendo*, that Anderson's disclosure recited above reads on the coding audio signals into audio data units according to the image data units, the Examiner should note that the sound field 474 that contains a sound clip is associated with JPEG data 464 and not JPEG data 464' (see Col. 7, lines 4-12 in Anderson). Nowhere does Anderson teach or suggest coding audio signals into audio data units according to the image data units.

The Examiner further alleges that Anderson discloses combining the image data units and audio data units, and storing combined data units in the memory (citing Col. 7, lines 4-12 and combined file 470 in memory 354 of Anderson). Applicants respectfully disagree with the Examiner's analysis.

The Examiner should first note that memory 354 serves as an additional image data storage area and is preferably a non-volatile device, readily removable and replaceable by a camera 110 user via buffers/connector 352 (see Col. 3, lines 61-64 in Anderson). Anderson merely discloses that the extended file format 470 that supports multiple media types also includes a sound field 474 that contains a sound clip associated with the image (see Col. 7, lines 4-12 in Anderson). Nowhere does Anderson teach or suggest combining the image data units and audio data units, and storing combined data units in the memory.

The Examiner further alleges that Anderson discloses accessing selected combined data, separating the image and audio data units via the image headers, and decoding and reproducing the image and audio data units (citing Col. 7, lines 4-12, Fig. 5 and Col. 6, line 45 et seq. of Anderson). Applicants respectfully disagree with the Examiner's analysis.

The Examiner should first note that Anderson does not teach or suggest combining the image data units and audio data units, and storing combined data units in the memory. More importantly, nowhere does Anderson teach or suggest separating the image and audio data units via the image headers, and decoding and reproducing the image and audio data units.

Anderson merely discloses "a standard header 462 for storing the date and time the image was captured", but fails to disclose or teach "generating each of image

headers for combining the image data units and the coded audio data units, combining the image headers, the image data units and audio data units, and storing combined data units in the memory," as recited in amended claim 14 above.

2.   The Examiner rejects claims 15 and 18-20 under 35 U.S.C. 103(a) as allegedly being unpatentable over Anderson (U.S. Patent No. 5,903,309) in view of Lee (U.S. Patent Publication No. 2002/0062313) and further in view of Kaku (U.S. Patent No. 6,728,471). Applicants respectfully traverse this rejection.

Exemplary embodiments of Applicants' claimed invention provide methods and devices comprising unique combinations of method steps and features, respectively, including, *inter alia*, a method for generating a combined signal in a mobile terminal equipped with a camera and an image codec, comprising the steps of: (a) coding each of one or more image signals captured by the camera into still pictures based upon a frame size via the image codec, inserting an image header containing image pattern information and frame size information into each of the coded image signals, and generating moving picture signals based on the coded image signals; (b) after generating the moving picture signals, generating at least one text signal; (c) combining the moving picture signals with a text signal; and (d) storing a combined signal representative of a result of the combining in a memory (see Applicants' independent claim 15).

Neither Anderson nor Nakabayashi, alone or in combination, discloses, teaches or suggests such unique combinations of features or method steps.

The Examiner first alleges that Anderson discloses coding the captured image signals into image data units based upon a frame size in a combined signal storing mode (citing JPEG data 464' of Anderson). Applicants respectfully disagree with the Examiner's analysis.

Exemplary embodiments of the present invention disclose "The image codec 80 performs the JPEG coding operation for image data based upon a frame size and the controller 10 waits for the JPEG image data to be received. Then, when JPEG coded image data of one frame is received, the controller 10 detects the received

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image data at step 457 and stores the JPEG image data in the memory 30 at step 459. The controller 10 repeatedly performs the above-described operations until the moving picture mode is completed. At this time, a plurality of data units stored in the memory 30 are JPEG image data units." (See Page 25, lines 13-19 in the specification of the instant application).

Anderson merely discloses that the JPEG data 464' is comprised in the extended file format 470 that supports multiple media types. Anderson further discloses that the information field 472 comprises a series of tags for storing information regarding the image represented by the JPEG data 464' (see Col. 6, lines 29-40 in Anderson). Nowhere does Anderson teach or suggest coding the captured image signals into image data units based upon a frame size in a combined signal storing mode.

Accordingly, Applicants' independent claims 14 and 15, as well as the dependent claims 16-20 (which incorporate, by reference, all of the features of their respective base claims) are patentable over Anderson, Nakabayashi, Lee and Kaku at least for these reasons. Withdrawal of the rejections of independent claims 14 and 15 (and of claims 16-20 which depends therefrom) under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson, Nakabayashi, Lee and Kaku is respectfully requested.

Conclusion

Reconsideration of the above-identified application and allowance of claims 14–20 are respectfully requested.

In view of the above, it is believed that the application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Respectfully submitted,

Stanislav Torgovitsky
Attorney for Applicants
Reg. No. 43,958

Roylance, Abrams, Berdo & Goodman, L.L.P.
1300 19th Street, N.W., Suite 600
Washington, D.C. 20036
(202) 659-9076

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